

Exhibit 6D

Excerpts of July 14, 2014 R. Cline Deposition Transcript

<p style="text-align: right;">Page 1</p> <p>1 IN THE UNITED STATES BANKRUPTCY COURT 2 FOR THE EASTERN DISTRICT OF MICHIGAN 3 4 5 6 In Re:) Chapter 9 7 CITY of DETROIT, MICHIGAN,) Case No. 13-53846 8 Debtor.) Hon. Steven Rhodes 9 10 11 12 The Videotaped Deposition of ROBERT CLINE, 13 Taken at Jones Day 14 51 Louisiana Avenue, NW 15 Washington, DC 16 Commencing at 9:05 a.m. 17 Monday July 14, 2014, 18 Before Marjorie Peters, RMR, CRR 19 20 21 22 23 24 25</p>	<p style="text-align: right;">Page 3</p> <p>1 For Creditor National Public Finance Guarantee Corp. 2 3 JEFFREY S. BEELAERT, ESQ. 4 SIDLEY AUSTIN, LLP 5 1501 K Street, N.W. 6 Washington D.C. 20005 7 8 For Creditor Financial Guaranty Insurance Company: 9 PRAVIN R. PATEL, ESQ. 10 WEIL GOTSHAL & MANGES, LLP 11 1395 Brickell Avenue 12 Suite 1200 13 Miami, Florida 33131 14 15 Also Appearing: 16 Jonathan Perry, Videographer 17 Marguerette Hosbach, Ernst & Young, via telephone 18 19 20 21 22 23 24 25</p>
<p style="text-align: right;">Page 2</p> <p>1 APPEARANCES: 2 For the Debtor City of Detroit and the witness: 3 GEOFFREY S. STEWART, ESQ., 4 SARAH A. HUNGER, ESQ., 5 CHRISTOPHER DiPOMPEO, ESQ. 6 JONES DAY 7 51 Louisiana Avenue, N.W. 8 Washington, D.C. 20001-2113 9 10 11 For the Official Committee of Retirees: 12 DAN BARNOWSKI, ESQ. 13 DENTONS US, LLP 14 1301 K Street, N.W. 15 Suite 600, East Tower 16 Washington, D.C. 20005-3364 17 18 For Syncora Guarantee, Inc., and Syncora Capital 19 Assurance, Inc. 20 21 DOUGLAS G. SMITH, P.C. 22 KIRKLAND & ELLIS, LLP 23 300 North LaSalle 24 Chicago, Illinois 60654 25 26 For Creditor Assured Guaranty: 27 LISA SCHAPIRA, ESQ. 28 CHADBOURNE & PARKE, LLP 29 30 Rockefeller Plaza 30 New York, New York 10112 31 32 33 34 35</p>	<p style="text-align: right;">Page 4</p> <p>1 I N D E X 2 WITNESS PAGE 3 Robert Cline 6 4 5 EXHIBITS PAGE 6 Exhibit No. 1 112 7 Exhibit No. 2 149 8 Exhibit No. 3 164 9 Exhibit No. 4 179 10 Exhibit No. 5 278 11 Exhibit No. 6 280 12 Exhibit No. 7 281 13 Exhibit No. 8 285 14 Exhibit No. 9 292 15 16 17 18 19 20 21 22 23 24 25</p>

Pages 1 to 4

<p style="text-align: right;">Page 5</p> <p>1 R. CLINE</p> <p>2 THE VIDEOGRAPHER: This is disk number one</p> <p>3 of the video deposition of Robert Cline taken in</p> <p>4 the matter of the City of Detroit, Michigan in the</p> <p>5 U.S. Bankruptcy Court for the Eastern District of</p> <p>6 Michigan. Chapter 9, Case No. 13-53846.</p> <p>7 We are at the offices of Jones Day, 51</p> <p>8 Louisiana Avenue Northwest, Washington, D.C. The</p> <p>9 time is approximately 9:04 a.m. The date is July</p> <p>10 14th, 2014. The court reporter is Marjorie Peters</p> <p>11 and the videographer is Jonathan Perry, both here</p> <p>12 on behalf of Elisa Dreier Reporting Company.</p> <p>13 Would counsel please introduce yourselves</p> <p>14 and state whom you represent.</p> <p>15 MR. SMITH: Doug Smith for Syncora.</p> <p>16 MR. STEWART: Geoffrey Stewart and Sarah</p> <p>17 Hunger of Jones Day for the City of Detroit and for</p> <p>18 the witness.</p> <p>19 MS. SCHAPIRA: Lisa Schapira from</p> <p>20 Chadbourne & Parke for Assured Guaranty.</p> <p>21 MR. BEELAERT: Jeff Beelaert from Sidley</p> <p>22 Austin for National.</p> <p>23 MR. PATEL: Pravin R. Patel from Weil</p> <p>24 Gotshal & Manges representing Financial Guaranty</p> <p>25 Insurance Company.</p>	<p style="text-align: right;">Page 7</p> <p>1 R. CLINE</p> <p>2 revenue estimates for the City of Detroit.</p> <p>3 Q. Okay. And what is your area of expertise?</p> <p>4 A. For my professional career, I've worked in</p> <p>5 public finance, the economic aspects of public finance.</p> <p>6 Q. Okay. So, you would be an expert in public</p> <p>7 finance and the economic aspects of public finance; is</p> <p>8 that correct?</p> <p>9 A. My professional career has been doing state</p> <p>10 tax work, whether it's revenue estimating, tax bill</p> <p>11 analysis or forecasting.</p> <p>12 Q. Okay. You wouldn't hold yourself out as an</p> <p>13 expert in urban policy, correct?</p> <p>14 A. I would not.</p> <p>15 Q. And you wouldn't hold yourself as an expert on</p> <p>16 health benefits?</p> <p>17 A. I would not.</p> <p>18 Q. You're not an expert on government in general?</p> <p>19 A. I'm not.</p> <p>20 Q. You're not an expert on blight reduction?</p> <p>21 A. No, I'm not.</p> <p>22 Q. Not an expert on art valuation?</p> <p>23 A. No.</p> <p>24 Q. Not an expert on pensions?</p> <p>25 A. No.</p>
<p style="text-align: right;">Page 6</p> <p>1 R. CLINE</p> <p>2 THE VIDEOGRAPHER: And would the reporter</p> <p>3 swear in the witness, please.</p> <p>4 ROBERT CLINE,</p> <p>5 a witness, having been first duly sworn, was examined and</p> <p>6 testified as follows:</p> <p>7 BY MR. SMITH:</p> <p>8 Q. Good morning, Mr. Cline. You have been</p> <p>9 deposed before; is that correct, or not?</p> <p>10 A. I have testified in a court case before.</p> <p>11 Q. Okay. Have you ever given a deposition?</p> <p>12 A. I don't remember. I have prepared reports. I</p> <p>13 don't remember whether I actually participated in this</p> <p>14 type of deposition.</p> <p>15 Q. Okay. I'll be asking you a series of</p> <p>16 questions, and you will let me know if you don't</p> <p>17 understand any of my questions?</p> <p>18 A. I will.</p> <p>19 Q. Okay. And feel free to take a break whenever</p> <p>20 you need to, okay?</p> <p>21 A. All right.</p> <p>22 Q. The report you filed, your report in this</p> <p>23 matter, you're acting as an expert in tax policy; is that</p> <p>24 correct?</p> <p>25 A. My responsibility in this project was to do</p>	<p style="text-align: right;">Page 8</p> <p>1 R. CLINE</p> <p>2 Q. Not an expert on government grants?</p> <p>3 A. No.</p> <p>4 Q. Do you hold yourself out as an expert on</p> <p>5 casinos or wagering revenue?</p> <p>6 A. I do not.</p> <p>7 Q. Do you hold yourself out as an expert on state</p> <p>8 revenue sharing?</p> <p>9 A. I've studied state revenue sharing.</p> <p>10 Q. In what context?</p> <p>11 A. The State of Michigan, I was responsible for</p> <p>12 various revenue estimates.</p> <p>13 Q. And other than that, do you have any</p> <p>14 experience with state revenue sharing?</p> <p>15 A. I do not.</p> <p>16 Q. You're not an expert on Detroit's government,</p> <p>17 correct?</p> <p>18 A. I am not.</p> <p>19 Q. Not an expert on information technology?</p> <p>20 A. No.</p> <p>21 Q. Not an expert on transportation systems.</p> <p>22 A. No.</p> <p>23 Q. Have you ever done forecasting for a city?</p> <p>24 A. I have not done forecasting for a city.</p> <p>25 Q. And you're not an expert in accounting, are</p>

Page 9

1 R. CLINE

2 you?

3 A. I am not.

4 Q. You're not an expert on Chapter 9

5 bankruptcies?

6 A. No, I'm not.

7 Q. You're not a restructuring expert, correct?

8 A. No.

9 Q. You're not holding yourself out as a legal

10 expert, correct?

11 A. No, I'm not.

12 Q. And you're not a lawyer, correct?

13 A. I am not.

14 Q. Have you ever done a tax forecast for a

15 wagering tax before?

16 A. No, I have not.

17 Q. And have you ever done a tax forecast for a

18 corporate tax?

19 A. I have for the State of Michigan, and I did

20 for the State of Minnesota.

21 Q. Okay. But in the context of corporate tax

22 revenues to a city, you haven't done a forecast?

23 A. I have not.

24 Q. You haven't done a municipal income tax

25 forecast before, have you?

Page 10

1 R. CLINE

2 A. I have not.

3 Q. You haven't done a municipal property tax

4 forecast, have you?

5 A. I have not.

6 Q. Have you ever done a tax forecast over a

7 period of -- as long as ten years?

8 A. I have not.

9 Q. Okay. Typically, what was the length of time

10 of the forecasts you have done previously?

11 A. The forecasts were usually tied to the budget

12 cycle, determined by the legislature. You might go out

13 four to six years.

14 Q. Okay. So, the standard forecast length that

15 Michigan used was four to six years?

16 A. I would say it was four, in Michigan.

17 Q. Okay. So, the generally accepted standard

18 length of a forecast in Michigan was four years?

19 A. That was the forecast tied to the budget

20 cycle. You would do forecasts longer term for other

21 types of projects.

22 Q. Okay. So, and the longest term forecast you

23 ever performed in the ordinary course of your work as a

24 forecaster was six years; is that correct?

25 A. I might have done forecasts that went beyond

Page 11

1 R. CLINE

2 that. I don't recall.

3 Q. Okay. But sitting here today, you can't

4 identify any forecasts you ever did that was longer than

5 six years?

6 A. I do not remember one.

7 Q. And I mean, just to get -- make the record

8 clear, the standard forecast for purposes of tax

9 forecasting in Michigan state was four years; is that

10 correct?

11 A. I believe it is. The budget cycle would be

12 either two years or four years of forecasts.

13 Q. Okay. So, the standard forecast length in

14 Michigan and the accepted forecast length for tax

15 forecasting is either two or four years; correct?

16 A. Correct.

17 Q. And you previously worked as an expert in one

18 case; is that correct?

19 A. I did.

20 Q. And is that the only case you worked as an

21 expert?

22 A. As I can recall, that was the only case where

23 I testified as an expert.

24 Q. And when you testified as an expert, it wasn't

25 in forecasting, correct?

Page 12

1 R. CLINE

2 A. It was not.

3 Q. When did you begin your work for Detroit?

4 A. It would have been in the spring, I believe,

5 of 2013.

6 Q. Your work in this case, you have prepared some

7 expert opinions for the confirmation hearing, correct?

8 A. I have -- I don't understand the question.

9 Q. Okay. Well, you know you filed an expert

10 report.

11 A. Correct.

12 Q. You know that, right?

13 A. Correct.

14 Q. And you're acting as an expert who is going to

15 testify at the confirmation hearing?

16 A. I understand that, yes.

17 Q. Okay. And I'm just wondering, other than your

18 work as an expert in the testimony you're going to give

19 at the confirmation hearing, have you done any other work

20 for the City of Detroit?

21 A. If you could clarify that question. Are you

22 referring to all of the work I have done as an EY

23 employee for the City of Detroit?

24 Q. Well, yes. Basically, what I'm trying to

25 figure out is I have a copy of your expert report, and

<p style="text-align: right;">Page 45</p> <p>1 R. CLINE</p> <p>2 conducted on Detroit income tax, wagering tax, utility</p> <p>3 users' tax or corporate tax, correct?</p> <p>4 A. I am aware of the forecasts the City of</p> <p>5 Detroit did for those tax sources.</p> <p>6 Q. Is that the forecast that you have done, or is</p> <p>7 that a different forecast?</p> <p>8 A. That would be the forecast prepared as the</p> <p>9 normal budgetary cycle for the City of Detroit.</p> <p>10 Q. All right. Did you perform that, or did</p> <p>11 somebody else perform that?</p> <p>12 A. It was done -- my understanding is it was done</p> <p>13 by the City.</p> <p>14 Q. And the City -- what time period do they use</p> <p>15 as their standard period for forecasting?</p> <p>16 A. I believe they go out two years, might be</p> <p>17 three, but I believe it's a two-year forecast.</p> <p>18 Q. You're not aware of any forecast conducted for</p> <p>19 the City of Detroit that's longer than three years,</p> <p>20 correct?</p> <p>21 A. I'm not aware of any studies of forecasting</p> <p>22 tax revenues beyond that period of time.</p> <p>23 MR. STEWART: You mean by the City of</p> <p>24 Detroit not for the City of Detroit, right,</p> <p>25 Mr. Smith?</p>	<p style="text-align: right;">Page 47</p> <p>1 R. CLINE</p> <p>2 Q. -- correct, that's ever been done?</p> <p>3 A. I don't know if that's correct.</p> <p>4 Q. Okay. Sitting here --</p> <p>5 MR. STEWART: Do let him finish his</p> <p>6 question before you answer, because you're making</p> <p>7 his life harder, too.</p> <p>8 BY MR. SMITH:</p> <p>9 Q. Sitting here today, you can't identify any</p> <p>10 forecasts using the type of methodology that you used for</p> <p>11 the City of Detroit, correct?</p> <p>12 A. No, that's not correct.</p> <p>13 Q. What forecast has been done for the City</p> <p>14 that's used the methodology you used?</p> <p>15 A. The methodology that we have used is a fairly</p> <p>16 standard forecasting methodology that's been used</p> <p>17 extensively in the City of Detroit and for the State of</p> <p>18 Michigan and in other cities.</p> <p>19 Q. Have you reviewed any depositions in this</p> <p>20 case?</p> <p>21 A. I have not, other than my own.</p> <p>22 Q. The -- you say that the methodology used is a</p> <p>23 standard methodology that's been used before, correct?</p> <p>24 A. The methodology we used in constructing the</p> <p>25 forecasting model is based upon my experience as a</p>
<p style="text-align: right;">Page 46</p> <p>1 R. CLINE</p> <p>2 MR. SMITH: No, I mean for.</p> <p>3 BY MR. SMITH:</p> <p>4 Q. You're not aware of any forecasts for the City</p> <p>5 of Detroit going out more than three years, whether</p> <p>6 conducted by the City or any other party, correct?</p> <p>7 A. I am not.</p> <p>8 MR. STEWART: Excluding his?</p> <p>9 MR. SMITH: Yes. We're excluding his.</p> <p>10 MR. STEWART: Yeah. That's what I figured.</p> <p>11 That's why I raised it.</p> <p>12 BY MR. SMITH:</p> <p>13 Q. Your forecast is anomalous, correct, in terms</p> <p>14 of the length of time that it goes out, correct?</p> <p>15 MR. STEWART: Objection.</p> <p>16 THE WITNESS: I don't know what you mean by</p> <p>17 "anomalous."</p> <p>18 BY MR. SMITH:</p> <p>19 Q. It means there's no forecast like the one</p> <p>20 you've conducted here that's ever been conducted for the</p> <p>21 City of Detroit, correct?</p> <p>22 A. I did not say that.</p> <p>23 Q. Well, I'm asking you now. There's no forecast</p> <p>24 like the one you've conducted for the City of Detroit --</p> <p>25 A. I don't --</p>	<p style="text-align: right;">Page 48</p> <p>1 R. CLINE</p> <p>2 revenue forecaster, and I believe it is fairly standard</p> <p>3 in terms of how State revenue forecasting is done.</p> <p>4 Q. Can you point me to any treatise or other</p> <p>5 publication that lays out the methodology you've used for</p> <p>6 forecasting in this case?</p> <p>7 A. There are a number of publications, books, and</p> <p>8 articles that discuss revenue forecasting. I can't give</p> <p>9 you specific references today.</p> <p>10 Q. But is there any book or other written</p> <p>11 publication that specifically lays out the specific</p> <p>12 methodology that you've used in this case?</p> <p>13 A. The methodology that we used in this case is</p> <p>14 the methodology that I thought followed as a tax revenue</p> <p>15 estimator in both the State of Minnesota and the State of</p> <p>16 Michigan.</p> <p>17 Q. Okay. And you were doing forecasting for the</p> <p>18 State, not cities, correct?</p> <p>19 A. Correct.</p> <p>20 Q. And you never used -- while you were at the</p> <p>21 State of Minnesota or the State of Michigan, you never</p> <p>22 forecast tax revenue out to 10 years, correct?</p> <p>23 A. I don't know if that's a correct statement.</p> <p>24 Q. Sitting here today, you can't identify any</p> <p>25 instance when you were at either the State of Minnesota</p>

Pages 45 to 48